

DEPARTMENT OF HEALTH AND ENVIRONMENT

Forbes Field

Topeka, Kansas 66620-0001

Phone (913) 296-1500

Mike Hayden, Governor

Stanley C. Grant, Ph.D., Secretary

Gary K. Hulett, Ph.D., Under Secretary

RCRA COMPLIANCE INSPECTION REPORT GENERATORS AND TRANSPORTERS CHECKLISTA. GeneralDate 9/23/88 Time 10:35 A.M. EPA ID No. KSD981712854Facility Name Teledyne IndependenceStreet One Freedom Drive P.O. Box 946City Independence, Kansas Zip 67301County Montgomery Phone 316/331-8180Contacts Kellie McKenna, Personnel & Safety DirectorInspector Roger CarmanOther Lynn Beavers, Quality Manager; Lloyd Meek, Production Quality PlannerB. Hazardous Waste Determination

262.11

1. Does generator generate waste(s) listed in 261.31, 261.32, or 261.33? (YES) NO
 If yes, list waste(s), EPA Hazardous Waste No. according to 40 CFR, Subpart D, and quantity/month:

EPA Hazardous Waste No.	Describe Waste Material	Quantity/Month	Method of Disposal
D001	Petroleum solvents	420 lbs./mo.	Hydrocarbon Recyclers, Inc.
D002	(Turco) alkaline wash	332 lbs./mo.	
D001	Waste isopropanol	336 lbs./mo.	
D001	Hydrocarbon mixture (calibrating fluid)	none	

2. Does generator generate waste(s), not listed, that exhibit hazardous characteristics (corrosivity, ignitability, reactivity, EP toxicity)? (YES) NO

- a. If yes, list waste(s), EPA Hazardous Waste No. according to 40 CFR, Subpart C, and quantity.

EPA Hazardous Waste No.	Waste Material	Quantity/Month	Method of Disposal
F001	1-1-1 trichloroethane	432 lbs./mo.	Hydrocarbon Recyclers, Inc.

(1. Cont'd)

Possibly nonhazardous	{ D001	Wastewater & petroleum solvent	332 lbs./mo.	Hydrocarbon Recyclers, Inc.
	{ D001	Waste Oakite detergent wash	164 lbs./mo.	



- b. Does generator determine characteristics by testing or by applying knowledge of processes? Explain below:
Knowledge of process

1. If determined by testing, did generator use test method 261.21, 261.22, 261.23, or 261.24 or was equivalent test method used? _____

YES NO ☒

a. If equivalent method used, obtain copy of test method.

3. Are there any other wastes generated by generator?

☒ YES NO

a. If yes, list below:

<u>Waste Description</u>	<u>Method of Disposal</u>
Wastewater with fluorescent dye from nondestructive test tank	POTW (transported by tank truck to sewage plant)

b. Did the generator test these wastes to determine if hazardous?

YES NO ☒

Explain if necessary:

City has approved disposal of the above wastewater in their system. This water does not go to the industrial park city lagoon, but rather to the city treatment plant.

4. Generator size classification:

a. Does firm generate less than 25 kg. of hazardous waste per month (Small quantity generator)?

YES ☒ NO

b. Does firm generate 25 kg. or more but less than 1,000 kg. of hazardous waste per month (Kansas generator)?

YES ☒ NO

c. Does firm generate more than 1,000 kg. of hazardous waste per month (EPA generator)?

☒ YES* NO

*also stores greater than 1,000 kg. on-site

Hazardous waste determination requirements:

☒ Adequate ☐ Inadequate

If generator generates less than 25 kg. of hazardous waste per month or accumulates less than 1,000 kg. stop here.

C. Manifests

1. Does generator ship waste off-site?

☒ YES NO

262.21

a. If yes, does manifest include:

1. Manifest document number?

☒ YES NO

2. Generator's name, address, phone number, and EPA ID number?

☒ YES NO

3. Name and EPA ID number of each transporter?

☒ YES NO

4. Name, address, and EPA ID number of designated facility?

☒ YES NO

5. Name, address, and EPA ID number of alternate facility if any. (The generator may also provide instructions to return waste to generator if undeliverable)?

YES NO ☒ NA

6. Waste information required by DOT-Shipping name, (49 CFR 172.101, 172.202, 172.203) total quantity, type and number of containers?

☒ YES NO

7. Certification information - "This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to applicable regulations of DOT and EPA"?

☒ YES NO

262.23

b. Does generator retain copies of manifest?

If yes, complete 1 through 4.

☒ YES NO

1. Does generator sign and date all manifests by hand?

☒ YES NO NA

2. Does generator obtain handwritten signature and date of acceptance from initial transporter?

☒ YES NO NA

3. Does generator retain copy of manifest signed by both generator and transporter?

☒ YES NO NA

262.40

4. Does generator retain copy of manifest signed and dated by T/S/D facility owner/operator for three years?

☒ YES NO NA

Manifesting requirements:

☒ Adequate ☐ Inadequate

D. Pre-Transport Requirements

- 262.30 1. Does generator package waste in accordance with DOT requirements (49 CFR 173, 178, and 179)? ☒ YES ☐ NO
- 262.31 2. Does generator label each package in accordance with DOT requirements (49 CFR 172)? ☒ YES ☐ NO
- 262.32 3. Does generator mark each package in accordance with DOT requirements (49 CFR 172)? ☒ YES ☐ NO
4. Does generator mark each container of 110 gallons or less as below: ☒ YES ☐ NO
- Hazardous Waste - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. E.P.A.
Generator's Name and Address _____
Manifest Document Number _____
- 262.33 5. Does generator have placards to offer to transporters (49 CFR 172, Subpart F)? YES ☒ NO

Pre-transport requirements:

[] Adequate [x] Inadequate

E. Record Keeping and Reporting

- 262.40 1. Does generator keep a copy of completed manifests from designated facilities for three years? ☒ YES ☐ NO
2. Does generator keep a copy of each Annual Report and Exception Report for three years? ☒ YES ☐ NO
3. Does generator keep records of test results and waste analyses used in determining hazardous or non-hazardous nature of wastes for three years? ☒ YES ☐ NO

Record keeping and reporting requirements:

[x] Adequate [] Inadequate

F. Special Conditions

1. Has generator received from or transported to a foreign source any hazardous waste? YES ☒ NO

- a. If yes, has generator filed a notice with the Regional Administrator? YES NO (N)
- b. Is waste manifested and signed by foreign cosignee? YES NO (N)
- c. If generator transports wastes out of the country, has confirmation of delivered shipment been received? YES NO (N)

Special conditions requirements:

[x] Adequate [] Inadequate

G. Accumulation Time

- 262.34 1. Does generator temporarily store waste before transport for 90 days or less? (YES) NO
- a. If yes, is waste placed in containers? (YES) NO
- If yes,
1. Check overall condition of containers.
- 265.173 2. Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste? (YES) NO
- 265.174 3. Does owner/operator inspect areas where containers are stored, at least weekly, for signs of leakage and/or deterioration caused by corrosion or other factors? (YES) NO
- 265.176 4. Are containers holding ignitable or reactive waste located at least 15 meters (50 feet) from the facility's property line? YES NO
- location of property line not determined
- 265.177 5. If waste in containers is incompatible with other materials stored nearby, are the containers separated from the other materials by means of a dike, berm, wall, or other device? YES NO
- b. If yes, is waste placed in tanks? YES (NO)
- If yes, fill out tanks checklist except 265.193.
2. Is the date accumulation began clearly marked and visible for inspection on each container? (YES) NO

3. T- containers and tank labels marked clearly
W the words "Hazardous Waste"? One 55-gallon drum

YES (NO)

Note: If storage period exceeds 90 days then the facility is also a T/S/D facility. If facility is a T/S/D, go to T/S/D checklist here.

Accumulation time requirements:

[] Adequate [X] Inadequate [] Not Applicable

If generator is a Kansas generator stop here.

H. Requirements for Generators Operating Unpermitted Storage Facilities (Non T/S/D)

1. Does the owner/operator maintain at the facility, the following documents and records:
 - a. Job title and job description for each position related to hazardous waste management? YES (NO)
 - b. Description of type and amount of training to be given each person? YES (NO)
 - c. Records of training given to facility personnel? YES (NO)

Personnel training requirements:

[] Adequate [X] Inadequate [] Not Applicable

2. The generator who accumulates waste on-site must meet the following requirements of preparedness and prevention (Subpart C):

265.31

- a. Does an inspection of the facility show any evidence of fire, explosion, or contamination? YES (NO)
- b. If applicable to the facility, is the facility equipped with:
 1. Internal communication or alarm system easily accessible in case of emergency? (YES) NO
 2. Telephone, hand-held two-way radio capable of summoning emergency response personnel? (YES) NO

- | | | | | | |
|--------|----|--|--------------------------------------|-------------------------------------|-------------------------------------|
| | c. | Are portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment provided? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| | d. | Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| 265.33 | e. | Is this equipment (a-d above) tested and maintained to assure its proper operation? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| 265.35 | f. | Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? | YES | <input checked="" type="radio"/> NO | <input type="radio"/> NA |
| 265.37 | g. | If appropriate for the type(s) of waste handled has the owner/operator made arrangements with the local emergency authorities to familiarize them with the layout of facility, properties of wastes handled and associated hazards, places where facility personnel normally work, entrances to roads inside facility, and possible evacuation routes? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| | h. | In areas where more than one police and fire department might respond, is there one designated authority? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| | i. | If appropriate for the type(s) of waste handled does the owner/operator have agreements with State emergency response teams, emergency response contractors, and equipment suppliers? | YES | <input type="radio"/> NO | <input checked="" type="radio"/> NA |
| | j. | If appropriate for the type(s) of waste handled has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries which could result from fires, explosions, or releases at the facility? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| | k. | In cases where local authorities decline to enter into such arrangements, is the refusal entered in the operating record? | YES | <input type="radio"/> NO | <input checked="" type="radio"/> NA |

Preparedness and prevention requirements:

☐ Adequate ☒ Inadequate ☐ Not Applicable

3. The generator who accumulates waste on-site must also meet the contingency plan and emergency procedures requirements (Subpart D):

265.53

- a. Contingency plan maintained at the facility and five copies been provided to outside agencies which may be called upon to provide emergency services? Not sent to local agencies

YES ☒ NO

265.52

- b. Does the plan describe arrangements made with emergency response personnel?
- c. Does the plan list the name(s), home address, and phone numbers of designated emergency coordinator(s)? No home addresses
- d. Is an emergency coordinator available at all times?
- e. Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities? No description of equipment's capabilities
- f. Does the plan include an evacuation plan for facility personnel?

YES ☒ NOYES ☒ NOYES ☒ NOYES ☒ NOYES ☒ NO

Contingency plan and emergency procedures requirements:

[] Adequate [X] Inadequate [] Not Applicable

Note: Determine if generator claims any information confidential. *No*

Note: Complete section "I" only for those generators that also transport hazardous waste. This section should also be used for commercial transporting companies.

I. Transporter Requirements

1. In addition to the requirements for manifests given in section C(1)(a)(1) through section C(1)(a)(6) above, does the manifest include:

263.20

- a. Signature of subsequent transporters, if any?
- b. Signature signifying proper delivery to designated or alternate designated facility?

YES NO N

YES NO

2. If the transporter transports wastes outside of U.S. do manifests show date waste left U.S.?

YES NO N

263.22

3. Does transporter keep copy of the manifest signed by generator, himself, and the next designated transporter or owner of T/S/D facility for three years?

YES NO

4. Are containers properly labeled and marked in accordance with DOT requirements (49 CFR 172)?

YES NO

5. Are vehicles properly placarded (49 CFR 172.500)?

YES NO

Transporter requirements:

☐ Adequate ☐ Inadequate ☐ Not Applicable

Additional Information and CONCLUSIONS This facility repairs and overhauls

jet engine components. The facility is located at the Independence airport,
south of Independence on US-75. This facility occasionally generates greater
than 1,000 kg. of waste and stores more than 1,000 kg. of waste for less than
90 days. Their original notification showed they were a Kansas generator.

This facility has two waste streams that may be nonhazardous, but they manage
them as hazardous wastes. These wastes are: 1) waste detergent (Oakite) wash
water (pH 9.88); 2) wastewater possibly contaminated with petroleum solvents
and 1-1-1 trichloroethane. Neither waste has been adequately tested. They
were directed to test these wastes (pH, flashpoint, purgeable organics).

Hazardous wastes are stored in a separate storage building south of the main
building. All drums (14 @ 55 gal, 1 @ 20 gal) were closed and dated. Fourteen
drums were labeled correctly, and 1 @ 55 gal. was not labeled "Hazardous Waste".
One 55-gal. drum outside the storage building contained an unknown liquid. The
drum was closed, but not labeled or dated. Four 55-gal. drums full of unknown
liquids were located outside the southwest corner of the main building. These
drums were closed, but not labeled or dated. On 10/05/88, in a phone conversa-
tion with Lloyd Meek, he said these drums contained waste calibrating fluid
(D001). The stated they labeled and dated the drums and will move them into
the storage building. The other drum's contents are being analyzed.

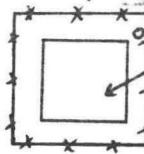
Form: GT 1/84
81-J

Vacant field

EPA Id. No. KSD981712854

Independence, KS Montgomery Co.

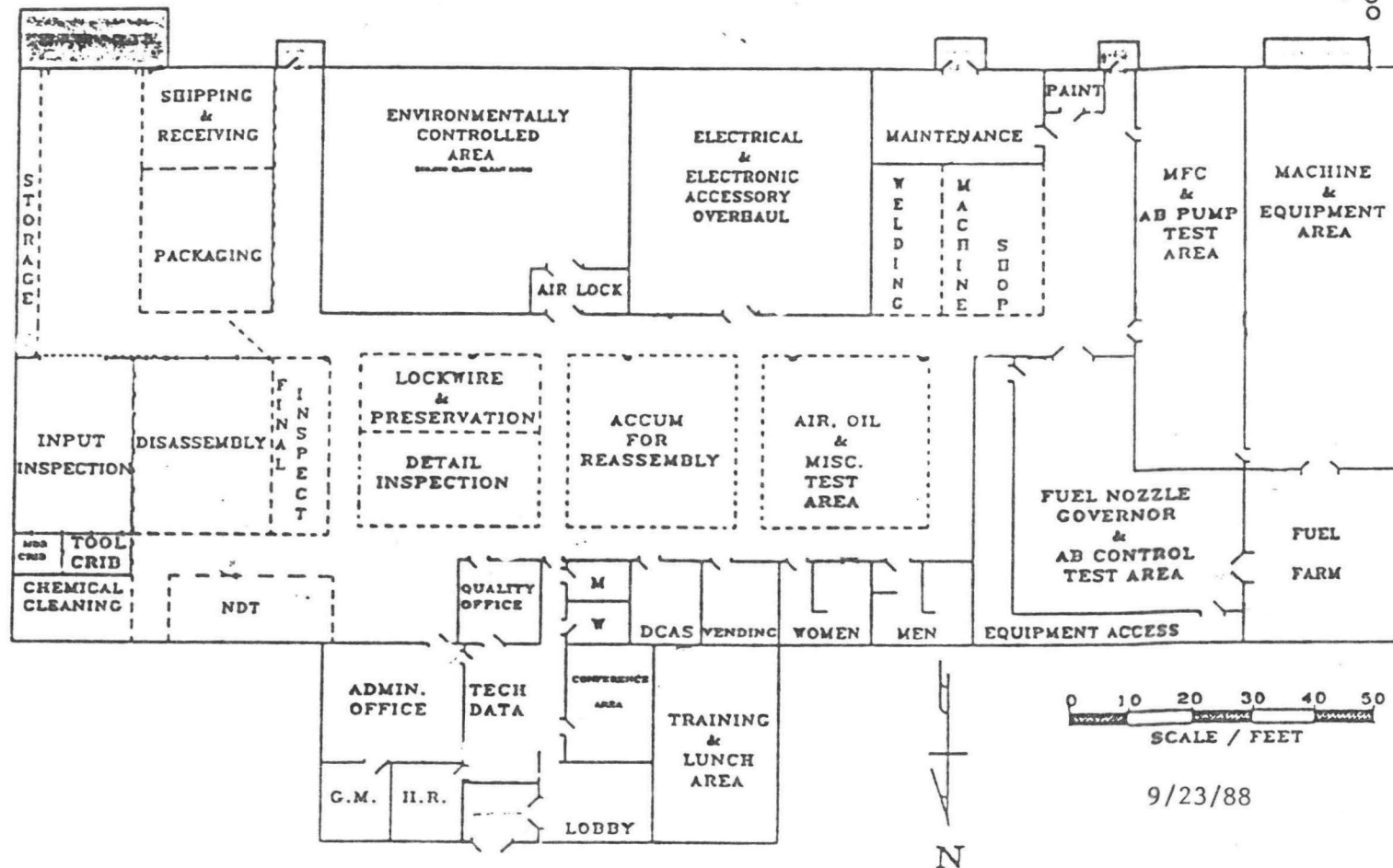
1 @ 55 gal. drum
contents unknown



Hazardous Waste
Storage Area

Parking

4 @ 55 gal drums of
calibrating fluid



ACCESSORY OVERHAUL FACILITY
TELEDYNE INDEPENDENCE

ADDENDUM TO
GENERATOR CHECKLIST
LAND BAN F-SOLVENTS

Teledyne Independence
Independence, KS
KSD981712854
09/23/88

A. F-Solvent Identification

1. Does the handler generate the following wastes?

a. F001

Yes No

b. F002

Yes No

c. F003

Yes No

If an F003 wastestream listed solely for for ignitability was mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic?

Yes No NA

d. F004

Yes No

e. F005

Yes No

B. National Variances and Extensions/Petitions

1. Is the waste generated by a Small Quantity Generator? [268.30(a)(1)]

Yes No

2. Is the waste generated from a RCRA corrective action? [268.30(a)(2)]

Yes No

3. Is the waste generated from a CERCLA response action? [268.30(a)(2)]

Yes No

4. Is the solvent waste a solvent-water mixture, solvent-containing sludge, or solvent-contaminated soil containing less than one percent total F001-F005 constituents by weight? [268.30(a)(3)]

Yes No

5. Any extensions/petitions approved?

Yes No

C. BDAT Treatability Group - Treatment Standards Identification

1. Did the generator correctly determine the appropriate treatability group and treatment standards of the waste [268.41]. Wastewaters containing solvents; spent methylene chloride

in pharmaceutical wastewaters
all other spent solvent wastes]?

Yes No

(NA)

D. Waste Analysis

1. Did the generator determine whether the waste exceeds treatment standards based on 268.7(a):

a. knowledge of the waste

(Yes)

No

b. TCLP

Yes

(No)

If knowledge, note how this is adequate:

If determined by TCLP, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: _____

Note any problems: _____

- c. Were waste tested using TCLP when a process or wastestream changes?

Yes

(No)

2. Did the F-solvent wastes exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

(Yes)

No

3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [268.3]

Yes

(No)

E. Off-site Shipments

- a. If F-solvent wastes exceed treatment standards, did generator provide treatment facility [268.7(a)(1)]:

(i) EPA waste number?

(Yes)

No

NA

(ii) Applicable treatment standard?

(Yes)

No

NA

(iii) Manifest number?

(Yes)

No

NA

(iv) Waste analysis data, if available?

Yes

No

(NA)

attached MSDS

Identify off-site treatment facilities:

- b. If F-solvent wastes do not exceed treatment standards, did generator provide the disposal facility [268.7(a)(2)]:

(i)	EPA Hazardous waste number?	Yes	No	<input type="radio"/> NA
(ii)	Applicable treatment standard?	Yes	No	<input type="radio"/> NA
(iii)	Manifest number?	Yes	No	<input type="radio"/> NA
(iv)	Waste analysis data, if available?	Yes	No	<input type="radio"/> NA
(v)	Certification regarding waste and that it meets treatment standards?	Yes	No	<input type="radio"/> NA

Identify land disposal facilities receiving the BDAT certified wastes.

- c. If waste is subject to nation-wide variance (e.g., solvent-water mixtures less than 1%), extension (268.5) or petition (268.6) does generator provide notice to disposer that waste is exempt from land disposal restrictions [268.7(a)(3)]?

Yes No ☐ NA

F. Storage of F-solvent waste

1. Was F-solvent waste stored for greater than 90 days (after variance 180/270 days for SOG)?

Yes ☐ No

If yes, was facility operating under interim status or permit?

Yes No ☐ NA

If yes, TSDF checklist must be completed.

G. Treatment Using RCRA 264/265 Exempt Units or Processes

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes?

Yes

☒ No

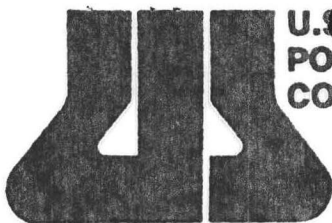
If yes, list type of treatment unit and processes _____

Land Ban Requirements:

☒ Adequate

☐ Inadequate

☐ Not Applicable



U.S.
POLLUTION
CONTROL, INC.

NOTICE !!

PLEASE RETAIN THESE DOCUMENTS
THIS IS THE ONLY COPY YOU WILL
RECEIVE !!

CUSTOMER SAMPLE REFERENCE NUMBER : LM88-0396
GENERATOR BROKER

TELEDYNE - INDEPENDENCE
P.O. BOX 946
INDEPENDENCE KS 67301
CONTACT : LLOYD MEEK
TELEPHONE : 316-331/8180

NO BROKER FOR THIS SAMPLE

ANALYST NAME : C. LEATHERMAN

SALES REP: B. SABBERT

SAMPLE ARRIVAL DATE : 03/02/88

PROFILE ARRIVAL DATE : 03/02/88

CUSTOMER SAMPLE # : LM88-0396

SAMPLE SITE : INDEPENDENCE, KS

DATE COMPLETED : 03/02/88

ACCEPTANCE/DENIAL INFORMATION

ACCEPTABLE FOR DISPOSAL AT THIS FACILITY

ACCEPTABLE FOR WASTEWATER TREATMENT

COMMENTS :

TYPE OF CONTAINER : Metal drums barrels kegs

:

WASTE ANALYSIS INFORMATION

WASTE PROFILE SHEET # 4875

WASTE NAME : OAKITE

COLOR : WHITE

PHYSICAL STATE : LIQUID

Specific Gravity : 1.0

pH : 9.88

Normality : <0.01

% Solids : 1.0

TLV Sniffer : <200

Flash Point : >140

Heating Value BTU/LB :

Heating Value BTU/GAL :

Hexavalent Chromium Cr :

Water Soluble : POS

Sulfides : NEG

Organic Chlorides : NEG

TOX :

TOC :

Cyanides as CN Total mg/l :

Cyanides as CN Free mg/l :

PCBs :

TOX Leachate :

Free Liquids : POS

PROCESS PRODUCING WASTE : CLEANUP

APPROVAL <i>[Signature]</i>	DATE 3/7/88	DENIAL	DATE
APPROVAL <i>[Signature]</i>	DATE 3/11/88	DENIAL	DATE